



6. Attached hereto as Exhibit 4 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0001327 – SL0001431, consisting of consolidated financial statements and an independent auditor’s report prepared by Deloitte for PRBB for the year ended December 31, 2013.

7. Attached hereto as Exhibit 5 is a true and correct copy of an article by Pyotr Rudenko entitled “Who will remain: What hides behind the mass revocation of banking licenses,” FORBES, dated March 17, 2016, available at <http://www.forbes.ru/finansy/rynki/315149-kto-ostanetsya-chto-skryvaetsya-za-massovym-otzyvom-bankovskikh-litsenzii>, and a certified English translation thereof.

8. Attached hereto as Exhibit 6 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0024211 – SL0024212, consisting of the certificate of incorporation for Wonderworks Investments Limited (“Wonderworks”) as available from the Registrar of Companies of the Republic of Cyprus.

9. Attached hereto as Exhibit 7 are true and correct copies of documents produced by Sergey Leontiev bearing Bates numbers SL0004504 – SL0004523, SL0004532 – SL0004536, SL0004545 – SL0004569, SL0004574 – SL0004583, SL0004588 – SL0004602, and SL0005251 – SL0005255, [REDACTED]

[REDACTED]

[REDACTED]

10. Attached hereto as Exhibit 8 is a true and correct copy of a document produced in native form by Sergey Leontiev bearing Bates number SL0035642, [REDACTED]

[REDACTED]

11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the deposition of Alexander Varshavsky, dated January 5, 2017.

12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the deposition of Andrei Pavlovich, dated December 16, 2016.

13. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of the deposition of Kamo Avagumyan, dated December 20, 2016.

14. Attached hereto as Exhibit 12 is a true and correct copy of documents produced by Alexander Varshavsky bearing Bates numbers AVPE0000010 – AVPE0000013, consisting of an August 17, 2011 email from Irina Meshkova to Valentina Nazanskaya, copying Yulia Semenova, with the subject, “documents for Raif,” attaching one PDF file entitled “Group structure,” one Excel file entitled “RbP Conso 07.01.2011,” and one Excel file entitled “Conso PL 6 months 2011,” and certified English translations thereof.

15. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the deposition of Irina Monakhova, dated January 17, 2017.

16. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the deposition of Yulia Semenova, dated December 19, 2016.

17. Attached hereto as Exhibit 15 is a true and correct copy of excerpts of the deposition of Vitaliy Popov, dated January 9, 2017.

18. Attached hereto as Exhibit 16 is a true and correct copy of excerpts of the deposition of Karen Avagumyan, dated December 14, 2016.

19. Attached hereto as Exhibit 17 is a true and correct copy of documents produced by Alexander Varshavsky bearing Bates numbers AVPE0002068 –AVPE0002070, consisting of a February 12, 2014 email from Yulia Semenova to Irina Monakhova, [REDACTED]

[REDACTED]

[REDACTED] and certified English translations thereof.

20. Attached hereto as Exhibit 18 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0033756 – SL0033761, consisting of an August 6, 2014 loan agreement entered into by and between Digitime Alliance Ltd. (“Digitime”) and Sanbay Holdings Limited (“Sanbay”).

21. Attached hereto as Exhibit 19 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0033754 – SL0033755, consisting of an August 7, 2014 loan agreement entered into by and between Digitime and Sanbay.

22. Attached hereto as Exhibit 20 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0034253 – SL0034257, consisting of a July 15, 2015 loan agreement entered into by and between Trustway Investments Ltd. and Sanbay.

23. Attached hereto as Exhibit 21 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0033766 – SL0033778, consisting of an October 23, 2014 email exchange among Irina Monakhova, Yanna Krisiuk, Lyubov Yershova and Vitaliy Popov, with the subject, “Re: FW: RE: RE: RE: Sunbay [sic] payment,” and a certified English translation thereof.

24. Attached hereto as Exhibit 22 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0001453 – AVPE0001459, consisting of a November 3, 2015 email exchange among Irina Meshkova, Yulia Semenova, and Irina Monakhova, with the subject, “FW: how to pay,” and a certified English translation thereof.

25. Attached hereto as Exhibit 23 is a true and correct copy of a June 2015 bulletin from the Reserve Bank of Australia written by Emily Perry and Florian Weltewitz entitled

“Wealth Management Products in China,” available at

<https://www.rba.gov.au/publications/bulletin/2015/jun/pdf/bu-0615-7.pdf>.

26. Attached hereto as Exhibit 24 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0000030 – SL0000045, consisting of a December 18, 2008 loan agreement entered into by and between Ailon Automobile Group (“Ailon AG”)<sup>1</sup> and Ambika Investments Limited (“Ambika”), and additional agreements thereto, identified in Appendix B to the Complaint (together, the “2008 Loan Agreement”).

27. Attached hereto as Exhibit 25 are true and correct copies of documents, a portion of which were produced by Sergey Leontiev bearing Bates numbers SL0000066, SL0001762, SL0000068, and SL0001759 – SL0001760, and a portion of which were produced by Alexander Varshavsky bearing Bates numbers AVPE0000174 – AVPE0000175, consisting of guarantees issued by PRBB in connection with the 2008 Loan Agreement, and certified English translations thereof.

28. Attached hereto as Exhibit 26 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0003014 – AVPE0003016, consisting of a December 17, 2008 loan agreement entered into by and between European Realty Corp. (“ERC”) and Ailon AG.

29. Attached hereto as Exhibit 27 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0000472 – AVPE0000473, consisting of a September 8, 2015 email from Irina Monakhova to Yulia Semenova, forwarding a December

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<sup>1</sup> Ailon AG was previously known as New York Motors Moscow. New York Motors Moscow is the signatory to the first of these agreements. For clarity, New York Motors Moscow and Ailon AG will be referred to interchangeably as “Ailon AG.”

18, 2008 email from Irina Monakhova to Valentina Nazanskaya and Svetlana Gerus, with the subject, “Money to be placed in deposit,” and a certified English translation thereof.

30. Attached hereto as Exhibit 28 is a true and correct copy of documents produced by Alexander Varshavsky bearing Bates numbers AVPE0001029 – AVPE0001033, consisting of a June 30, 2009 assignment of claims agreement entered into by and between Aylon AG and ERC, amendment No. 1 thereto, and a setoff agreement entered into by and between Aylon AG and ERC, and certified English translations thereof.

31. Attached hereto as Exhibit 29 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates number AVPE0005467, consisting of a July 6, 2010 agreement on the termination of assignment entered into by and between Aylon AG and ERC, and a certified English translation thereof.

32. Attached hereto as Exhibit 30 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0000949 – AVPE0000951, consisting of a chart of Aylon AG and Aylon Plaza loans and interest payments, and a certified English translation thereof.

33. Attached hereto as Exhibit 31 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0033715 – SL0033716, consisting of a December 7, 2010 email from Irina Monakhova to Valentina Nazanskaya, Yanna Krixiuk, and Maryana Pervushkina, with the subject, “RE: Loan \$19.9 mln.,” and a certified English translation thereof.

34. Attached hereto as Exhibit 32 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates number SL0000065, consisting of a December 9, 2014

agreement entered into by and between Aviron AG and Ambika, identified in Appendix B to the Complaint.

35. Attached hereto as Exhibit 33 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0002466 – AVPE0002480, consisting of a December 27, 2010 loan agreement entered into by and between European Realty Company and Ambika, and additional agreements thereto.

36. Attached hereto as Exhibit 34 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0002555 – AVPE0002562, consisting of a September 17, 2015 email from Alexander Zheleznyak to Vitaliy Popov, Irina Monakhova, Maxim Shamis, Alexander Varshavsky, Kamo Avagumyan, and Ekaterina Malygina with the subject, “Absolute Assignment and transfer of loans dated 9th of September 2015.pdf,” attaching one PDF file entitled “Absolute Assignment and transfer of loans dated 9th of September 2015,” and a certified English translation thereof.

37. Attached hereto as Exhibit 35 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0033741 – SL003743, consisting of a September 1, 2011 email exchange among Irina Monakhova, Valentina Nazanskaya and Yanna Krixiuk, with the subject, “RE: Agreement,” and a certified English translation thereof.

38. Attached hereto as Exhibit 36 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0000046 – SL0000064, consisting of a September 1, 2011 loan agreement entered into by and between Aviron AG and Ambika, and additional agreements thereto, identified in Appendix B to the Complaint (together, the “2011 Loan Agreement”).

39. Attached hereto as Exhibit 37 are true and correct copies of documents produced by Sergey Leontiev bearing Bates numbers SL0001763 – SL0001765, SL0000069 – SL0000070, SL0001758, SL0001756 – SL0001757, SL0000071 – SL0000072, consisting of guarantees issued by PRBB in connection with the 2011 Loan Agreement, and certified English translations thereof.

40. Attached hereto as Exhibit 38 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0003039 – AVPE0003042, consisting of an August 29, 2011 loan agreement entered into by and between Aylon AG and TO Jets Transporter Inc. (“TO Jets”).

41. Attached hereto as Exhibit 39 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0002834 – AVPE0002836, consisting of a September 1, 2011 assignment of rights agreement entered into by and between Aylon AG and TO Jets, and a certified English translation thereof.

42. Attached hereto as Exhibit 40 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates number AVP0005500, consisting of a September 5, 2011 agreement on the termination of assignment entered into by and between Aylon AG and TO Jets, and a certified English translation thereof.

43. Attached hereto as Exhibit 41 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0004795 – AVPE0004798, consisting of an August 12, 2015 email exchange among Valentina Nazanskaya, Irina Monakhova, Vitaliy Popov and Yulia Semenova, with the subject, “RE: Ambika,” attaching one PDF file entitled “SKM\_C224e15081210560,” and a certified English translation thereof.



44. Attached hereto as Exhibit 42 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0004801 – AVPE0004802, consisting of an August 12, 2015 email exchange among Irina Monakhova, Valentina Nazanskaya, Yulia Semenova and Vitaliy Popov, with the subject, “RE: Ambika,” and a certified English translation thereof.

45. Attached hereto as Exhibit 43 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0004846 – AVPE0004850, consisting of an August 13, 2015 email exchange among Yulia Semenova, Valentina Nazanskaya, Irina Monakhova, and Vitaliy Popov, with the subject, “RE: Ambika,” and a certified English translation thereof.

46. Attached hereto as Exhibit 44 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0004970 – AVPE0004973, consisting of an August 25, 2015 email from Yulia Semenova to Yanna Kriuk, with the subject, “Projects,” attaching two Word files entitled “Form AG,” and “Form Plaza,” and a certified English translation thereof.

47. Attached hereto as Exhibit 45 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0005003 – AVPE0005004, consisting of an August 26, 2015 email from Yulia Semenova to Valentina Nazanskaya, with the subject, “Guarantee AG 20,” attaching one Word file entitled “Guarantee AG 20,” and a certified English translation thereof.

48. Attached hereto as Exhibit 46 is a true and correct copy of Alexander Varshavsky’s Responses and Objections to Sergey Leontiev’s Requests for Admission, dated January 13, 2017.

49. Attached hereto as Exhibit 47 are true and correct copies of documents produced by Sergey Leontiev bearing Bates numbers SL0000001 – SL0000029, consisting of the promissory notes identified in Appendix A to the Complaint, and certified English translations thereof.

50. Attached hereto as Exhibit 48 is a true and correct copy of a January 20, 2016 email from Robert Stahl to Robert Weigel, copying Richard Sapinski, with the subject, “FW: Urgent: Debt confirmation (part 2),” attaching one PDF file entitled “PN 1,” which are the promissory notes issued to Karen Avagumyan and identified in Appendix A to the Complaint.

51. Attached hereto as Exhibit 49 are true and correct copies of documents, a portion of which were produced by Alexander Varshavsky bearing Bates numbers AVP0000977, AVP0000978, AVP0000982 and AVP0000983, and a portion of which were produced by Sergey Leontiev bearing Bates numbers SL0002397 – SL0002400, SL0002405 – SL0002407, SL0002409, SL0002412 – SL0002424, SL0002431 – SL0002434, SL0002436, SL0002438, SL0002440, SL0002442 – SL0002453, consisting of promissory notes issued by ZAO Financial Group “Life” in the name of Karen Avagumyan dated between January 17, 2012 and July 11, 2014, and certified English translations thereof.

52. Attached hereto as Exhibit 50 is a true and correct copy of a January 20, 2016 email from Robert Stahl to Robert Weigel and Richard Sapinski, with the subject, “FW: Urgent: Debt confirmation (part 3),” attaching two PDF files entitled “PN 2,” and “PN 3,” which are the promissory notes issued to Igor Renich and Diana Karapetyan and identified in Appendix A to the Complaint.

53. Attached hereto as Exhibit 51 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0004204 – AVPE0004233, consisting of

a November 30, 2015 email from Vitaliy Popov to Irina Monakhova, with the subject, “FW: Documents (for PRBB),” attaching three PDF files entitled “AKKAM,” “RIF,” and “KDS,” and a certified English translation thereof.

54. Attached hereto as Exhibit 52 is a true and correct copy of the corporate registration records for Ambika as available with the Registrar of Companies of the Republic of Cyprus, and a certified English translation thereof.

55. Attached hereto as Exhibit 53 are true and correct copies of documents produced by Sergey Leontiev bearing Bates numbers SL0003419 – SL0003449, SL0003479 – SL0003495, SL0003519 – SL0003689, SL0003709 – SL0003727, SL0003753 – SL0003897, SL0004066 – SL0004088, SL0004365 – SL0004370, SL0007591 – SL0007594, and SL0007597 – SL0007598, [REDACTED]

[REDACTED]

56. Attached hereto as Exhibit 54 is a true and correct copy of excerpts of the deposition of Charles W. Laurence, dated January 11, 2017.

57. Attached hereto as Exhibit 55 is a true and correct copy of the corporate registration records for Vennop Trading Limited as available with the Registrar of Companies of the Republic of Cyprus, and a certified English translation thereof.

58. Attached hereto as Exhibit 56 is a true and correct copy of the corporate registration records of OOO Alivikt as available on Russia’s United State Registry of Legal Entities at <https://egrul.nalog.ru>, dated January 24, 2017, and a certified English translation thereof.

59. Attached hereto as Exhibit 57 is a true and correct copy of the Notice of Liquidation filed in the State Registration Bulletin by ZAO Financial Group “Life” on April 1, 2015, and a certified English translation thereof.

60. Attached hereto as Exhibit 58 is a true and correct copy of excerpts of the deposition of Irina Zubiy, dated January 9, 2017.

61. Attached hereto as Exhibit 59 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0006163 – AVPE0006166, consisting of a December 18, 2015 draft deed of agreement between Alexander Zheleznyak, Sergey Leontiev, Avilon AG and Kamo Avagumyan.

62. Attached hereto as Exhibit 60 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0006115 – AVPE0006117, consisting of a November 18, 2015 draft deed of arrangement between Alexander Zheleznyak, Sergey Leontiev, Avilon AG and Kamo Avagumyan.

63. Attached hereto as Exhibit 61 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0006126 – AVPE0006127, consisting of a December 1, 2015 draft surety agreement between Alexander Zheleznyak and Kamo Avagumyan, and a certified English translation thereof.

64. Attached hereto as Exhibit 62 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0006134 – AVPE0006136, consisting of a December 7, 2015 draft agreement (No. 2) on promissory note acquisition between Sergey Leontiev and Diana Karapetyan, and a certified English translation thereof.

65. Attached hereto as Exhibit 63 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0006137 – AVPE0006139, consisting of

a December 7, 2015 draft agreement (No. 3) on promissory note acquisition between Sergey Leontiev and Igor Renich, and a certified English translation thereof.

66. Attached hereto as Exhibit 64 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0006140 – AVPE0006142, consisting of a December 7, 2015 draft note purchase agreement (No. 1) between Alexander Zheleznyak and Kamo Avagumyan, and a certified English translation thereof.

67. Attached hereto as Exhibit 65 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0002718 – AVPE0002719, consisting of a November 18, 2015 draft deed of arrangement between Alexander Zheleznyak, Sergey Leontiev, Avilon AG and Kamo Avagumyan.

68. Attached hereto as Exhibit 66 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0004244 – AVPE0004246, consisting of a December 8, 2015 email from Vitaliy Popov to Irina Monakhova, copying Alexander Varshavsky, with the subject, “FW: Documents,” and a certified English translation thereof.

69. Attached hereto as Exhibit 67 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVPE0006232 – AVPE0006237, consisting of a December 23, 2015 email from Irina Monakhova to Vitaliy Popov, copying Alexander Varshavsky, with the subject, “FW: Ambika,” and a certified English translation thereof.

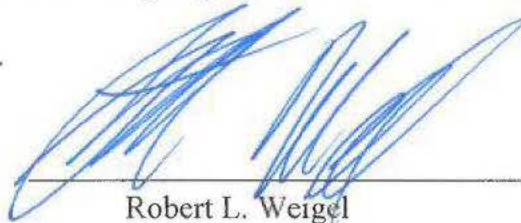
70. Attached hereto as Exhibit 68 is a true and correct copy of a document produced by Alexander Varshavsky bearing Bates numbers AVP0001007 – AVP0001014, consisting of a December 24, 2015 email from Vitaliy Popov to Kevin Garden, copying Alexander Gluhovsky and Maxim Shamis, with the subject, “RE: Avilon Automotive Group,” attaching one Word file

71. Attached hereto as Exhibit 69 is a true and correct copy of a January 20, 2016 email from Robert Stahl to Robert Weigel, with the subject, "FW: Urgent: Debt confirmation (part 1)," attaching five PDF files entitled "Add agrt 7," "Agrt 09122014," "Loan agrt 18122008," "Add agrt 5," and "Add agrt 6," which are the 2008 and 2011 Loan Agreements between Aviron AG and Ambika identified in Appendix B to the Complaint.

72. Attached hereto as Exhibit 70 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0002068 – SL0002075, consisting of a February 1, 2016 email from Robert Stahl to Robert Weigel, Alexander Zheleznyak, Sergey Leontiev, Denis Bazlov, Richard Sapinski, and Xenia Koycheva, with the subject, "FW: Varshavsky Matter," attaching one PDF file entitled "Bank warranties.pdf."

73. Attached hereto as Exhibit 71 is a true and correct copy of the complaint filed on November 16, 2016, in *Aviron AG v. Leontiev*, No. 656007/2016 (Sup. Ct. N.Y. Cty.).

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 27, 2017 in New York, New York.



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Robert L. Weigel